

VIA ELECTRONIC SUBMISSION

April 18, 2010

Re: WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45

Document ID: FCC-2011-0078-0001; **Docket ID:** FCC-2011-0078; Developing an Unified Intercarrier Compensation

To Whom It May Concern:

As Chief Executive Officer of the Colorado Rural Health Center, I am responding to the Notice of Proposed Rulemaking (NPRM), FCC-11-13, published in the **Federal Register**, Vol. 76, No. 41, Wednesday, March 2, 2011. The Colorado Rural Health Center (CRHC), the State Office of Rural Health for Colorado, works on behalf of a diverse and inclusive statewide constituency of over 3,500 people and organizations that provide healthcare in rural communities, including Critical Access Hospitals, Rural Health Clinics, and Community-funded Safety Net Clinics.

As Colorado's State Office of Rural Health, CRHC works closely with rural communities and providers to improve healthcare systems. Our organization provides rural providers with access to trusted resources to assist them with their journey to assess, adopt, and implement health information technology. This critical step requires access to and effective use of broadband internet related technology. CRHC encourages active participation in the Rural Health Care Program of the Universal Service Fund.

CRHC would like to comment on Section 21 on the following question:

Is the National Broadband Plan recommendation of 4 Megabits per second actual download speed and 1 Megabit per second upload speed adequate for rural communities?

Healthcare providers require certain broadband speeds to be able to provide quality care as health information technology increasingly becomes the standard for clinical operations. In addition, rural areas rely on telemedicine to improve the health of rural residents by reducing time and travel barriers to access specialty care. Telemedicine requires need reliable, adequate broadband.



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COLORADO RURAL HEALTH CENTER

In the National Broadband Plan, required actual broadband speed requirements for different types of health care providers are specified:

- **Hospitals:** 100 Megabits per second;
- **Clinic/Large Physician Practice (5–25 physicians):** 25 megabits per second;
- **Rural Health Center (up to 5 physicians):** 10 megabits per second;
- **Nursing Home:** 10 megabits per second;
- **Small Primary Care Practice (2-4 physicians):** 10 megabits per second; and
- **Single Physician Practice:** 4 megabits per second.

The proposed recommendation of 4 Megabits per second for rural communities is inadequate to support healthcare services. Rural communities and rural healthcare providers and facilities require robust broadband speeds and capabilities to support daily activities and sustain future growth in health information technology. **CRHC recommends that the minimum standard for broadband speed in rural communities be consistent with the speed requirements set by the National Broadband Plan for larger physician practices—25 Megabits per second.**

Thank you for the opportunity to comment on behalf of Colorado's rural healthcare providers and communities.

Sincerely,



Lou Ann Wilroy
Chief Executive Officer

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